

ARGUMENTS/REMARKS

Applicants would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and amended as necessary to more clearly and particularly describe and claim the subject matter which applicants regard as the invention.

Claims 1-5, 7-28, and 30-50 and 52-64 remain in this application. Claims 6, 29, and 51 have been canceled. New claims 65-66 have been added without adding any new matter.

Claims 1-5, 7-12, 15, 18-24, 26-28, 30-39, 42-50, 52, and 53-64 are rejected under 35 U.S.C. 103(a) as being unpatentable over by Saylor *et al.* (US 6,792,086) in view of Kuhn *et al.* (U.S. 6,341,264). Claims 13-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Saylor and Kuhn in view of Beyda *et al.* (U.S. 6,487,277). Claims 16-17, 40-41, and 51 were rejected under 35 U.S.C. §103(a) as being unpatentable over Saylor and Kuhn in further view of Woods *et al.* (U.S. 6,510,417). For the following reasons, the rejections are respectfully traversed.

As discussed at the personal interview conducted on July 31, 2008, we have amended the claims to recite that the user speech models that are further adapted by ordering from one provider, such as by interacting with that provider's interactive voice response application provided to, and executed by, the system, can also be utilized by *other* interactive voice response applications and/or by ordering from other providers. For example, claim 1 recites that "said user-specific speech model is further adapted to the specific user during said ordering of said product and/or services from any one of said service providers such that said further adapted model is then utilized for future ordering of products and/or services from any other of said service providers". Claim 30 recites similar features. Claim 50 recites that "said common speech models are adapted during each dialogue between said user calling the system and any of said interactive voice response applications of said one of said service providers during said ordering, such that said adapted speech models can be utilized by the other interactive voice response applications for the user ordering products and/or services from the other service providers". Claims 52, 53, 55, 56, 57, and 60-64 all recite similar features of sharing adapted models among various applications and/or providers.

Thus, the system effectively shares the user models amongst various different providers,

and the models are adapted by using the system for any of the providers such that other providers get the benefit of the adapted models. This means that a pool of providers each help to improve the same set of models, allowing far more improvement to the models than can occur if any single provider individually had to adapt the models themselves. None of the prior art teach such a feature, and thus these claims are patentable over the prior art for at least this reason.

Finally, claims 61 and 62 and new claim 65 recite that the user-specific models are speech *and* language models, a feature not disclosed in any of the cited references, and thus are patentable for this reason as well. New claim 65 recites that the speech and language models are further adapted, which is not disclosed in any of the references, and thus this claim is patentable over the references for this reason as well.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, then a personal interview between the Examiner and the undersigned attorney is requested to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. P&TS-33226.

Respectfully submitted,
PEARNE & GORDON, LLP

By: / Robert F. Bodi /
Robert F. Bodi, Reg. No. 48,540

1801 East 9th Street, Ste. 1200
Cleveland, Ohio 44114-3108
(216) 579-1700

March 9, 2009